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Attorneys for Plaintiffs James S. Goydos and Maria E. Martins

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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JAMES S. GOYDOS and MARIA E. MARTINS,	:	
	:	Case No. 3:19-cv-8966 (GC) (DEA)
Plaintiffs,	:	
vs.	:	
	:	APPLICATION FOR THE
RUTGERS, THE STATE UNIVERSITY a/k/a	:	EXTENSION OF PLAINTIFFS'
RUTGERS, THE STATE UNIVERSITY OF NEW	:	TIME TO ANSWER, MOVE, OR
JERSEY a/k/a RUTGERS, RUTGERS CANCER	:	OTHERWISE RESPOND
INSTITUTE OF NEW JERSEY (an independent	:	PURSUANT TO L. CIV. R. 6.1(b)
institute at Rutgers, The State University), STEVEN	:	
K. LIBUTTI, individually and in his official	:	
capacity, BRIAN L. STROM, individually and in his	:	
official capacity, TIMOTHY J. FOURNIER,	:	
individually and in his official capacity, EUGENE	:	
SIMON, individually and in his official capacity,	:	
JOHN AND JANE DOES 1-10 (names being	:	
fictitious and unknown), and ABC CORPS. 1-10	:	
(names being fictitious and unknown),	:	
	:	
Defendants.	:	
	:	
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To: Melissa E. Rhoads, Clerk
United States District Court for the District of New Jersey
Martin Luther King Building & United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

John K. Bennett, Esq.
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200 Connell Drive, Suite 2000
Berkeley Heights, New Jersey 07922
Attorneys for Defendants

Plaintiffs James S. Goydos and Maria E. Martins respectfully request that the Clerk enter an order extending the time in which they may answer, move, or otherwise respond to Defendants' Answer to Third Amended Complaint, Defenses, and Counterclaims. It is represented that:

1. No previous extension has been obtained.
2. Plaintiffs were served with a copy of Defendants' Answer to Third Amended Complaint, Defenses, and Counterclaims on June 23, 2023.
3. The time to answer, move, or otherwise respond expires on July 14, 2023.¹

Pursuant to Local Rule of Civil Procedure 6.1(b), Plaintiffs respectfully request that the time within which they may file an answer, move, or otherwise respond to Defendants' Answer to Third Amended Complaint, Defenses, and Counterclaims be extended by fourteen (14) days, to and including July 28, 2023.

¹ Plaintiffs initially filed the instant request on July 5, 2023 under ECF No. 114. Said request, however, contained a typo erroneously stating that Plaintiffs' answer, motion, or other response was due June 14, 2023 rather than July 14, 2023. Plaintiffs now refile the request to correctly state that Plaintiffs' answer, motion, or other response is not presently due until July 14, 2023 and that the requested extension is through July 28, 2023.

Respectfully submitted,

BLICK LAW LLC

Dated: July 6, 2023

By: s/ MARK A. SPEED, ESQ.

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Maria E. Martins*

The above application is **ORDERED GRANTED**. The time for Plaintiffs to respond to the counterclaim is extended until and including July 28, 2023.

ORDER DATED:

By:  _____

Douglas E. Arpert

United States Magistrate Judge